Calendly

Calendly Privacy White Paper – Calendly's Prelude

Version 1.0 – July 2023

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Introduction

Calendly's mission is to help you schedule more efficiently. To do so, we need some personal information to make your interview scheduling happen. We don't take this responsibility lightly. We recognize the importance of privacy and we want you to feel confident about using our services and in your interactions with us.

This Calendly Privacy White Paper - Calendly's Prelude ("document") is designed to provide insight on how we collect, use, store, and protect personal information from you and your candidates through the use of our scheduling automation platform for recruiting teams.

Whether you are an existing customer or a prospect interested in our service, we hope that this document serves as a valuable resource for you and relevant teams within your organization as you assess privacy and regulatory compliance topics.

This document is intended to supplement existing Calendly-issued privacy documentation for informational purposes only. It is not intended to provide legal advice or to address all circumstances that might arise. It does not create additional rights or remedies and should not be construed as a binding agreement. We will update this document from time to time as necessary to reflect changes in our practices, services, and laws and regulations.

For the avoidance of doubt, Calendly is the contracting entity for our scheduling automation platform for recruiting teams (formerly known as Prelude) as well as our core Calendly scheduling platform. Any references to Calendly in this document refer to Calendly as the service provider in the recruiting platform context. Information about the core Calendly scheduling platform is covered exclusively in our Calendly Privacy White Paper.

If you still have questions for our Privacy Team after reviewing this document please email privacy@calendly.com.

Types of Personal Information, Data Protection Roles and Purposes of Processing

For the purposes of this document, personal information is any information relating to an identified or identifiable person. The following sections provide more detail on the types of personal information that may be processed, data processing roles, and the purposes of processing in your interactions with our scheduling automation platform for recruiting teams.

Calendly as a Data Processor

The Calendly as a Data Processor use case involves the personal information submitted by or collected from you and/or your users or invitees, or any similar actions on your behalf, for the provision of the Calendly service. The personal information we collect may include, but is not limited to:

- Names and email addresses of users and candidates
- User-related information and preferences such as title/position, department, employer, other contact information such as phone number and physical business address, timezone, preferred language, preferred working hours, profile photo and calendar availability. Calendar integration to retrieve availability of users includes access to certain specific information about meetings in their calendar such as meeting name, invitees, and any notes included in the meeting - regardless of whether they were scheduled via our recruiting solution or not. We need this information to support the proper functioning of the platform (i.e., which meetings can be moved and which meetings cannot).

- Event details of meetings you schedule using our recruiting solution such as subject and title of meeting, description, meeting preferences (e.g., Zoom, Google Meet, phone call, etc.), participant and interviewer information (e.g., links to LinkedIn profiles, titles, their contact information)
- Attachments you wish to include to the email templates created by you within the platform to communicate with your candidates and interviewers
- Attributes or any organizational labels you attribute to your candidates and interviewers
- Read and/or write access to select fields of your chosen applicant tracking system (ATS)

Our recruiting solution is not intended to be used to collect sensitive personal information from candidates. Platform administrators from recruiting teams have the ability to customize and add certain fields to organize their candidates and interviewers in accordance with their goals and hiring practices. These additional functionalities, however, are not required fields for the platform to work, and will only be activated and customized at your discretion.

Calendly is the data processor (as the term is defined in the General Data Protection Regulation or "GDPR" or applicable law in Europe, the United Kingdom, applicable states in the United States or privacy laws from other countries in the world with similar terminology) and the service provider (as the term is defined in the California Consumer Privacy Act and its amendments, collectively, the "CCPA") of the personal information processed for service delivery described above.

Calendly will use such personal information for the following purposes:

- Provide and update the service
- Respond to any of your support-related inquiries or questions about the service
- Process any privacy-related request from you such as data deletion, data access or other legally required actions directed by you

- Resolve issues related to the service, including any downtime, bugs or service errors
- Carry out instructions that are explicitly authorized by you or your authorized agent

Calendly as a Data Controller

The Calendly as a Data Controller use case involves the personal information we need to protect and manage our business and account level information. The types of personal information could include, but are not limited to:

- Account and billing details
- Customer relationship management (CRM) data about you
- Platform metrics
- Platform security logs and certain cookie-derived information

Calendly is the data controller (as the term is defined in the GDPR or applicable law in Europe, the United Kingdom, or applicable states in the United States) **and the business** (as the term is defined in the CCPA) for the types of personal information listed in this section only for the purposes listed below:

- Understand and improve the Calendly service either via product research and development or improving performance or functionality
- Secure and protect the service and the data within it
- Detect, prevent, and protect the platform from abuse, including spam and violations of our terms of use
- Communicate with you regarding the service, including product-related updates or security and fraud notices
- Market our products and services, including sending emails about new product features or other news about Calendly or on topics we think would be relevant to the recipients (recipients may opt out of receiving these communications at any time).
- Manage your business account with us
- Protect Calendly's rights and interests

- Perform internal reporting including forecasting and financial analysis
- Manage legal compliance and disputes
- Administer actions related to mergers and acquisitions

Our Privacy Notice further describes our data collection and processing practices regarding your personal information.

Regulatory Compliance

Calendly is a market-leading recruiting solution. As a result, we serve customers all over the world who also have their own complex privacy compliance obligations. We are committed to taking the necessary steps to comply with relevant privacy laws and regulations, including the GDPR, the CCPA, and many others. We have implemented policies and procedures to comply with the many common elements of these applicable laws, and we regularly review our privacy practices so that we are up-to-date with the latest regulations.

Here are some examples of the regular activities and responsibilities managed by our dedicated Privacy Team:

- Conducting periodic reviews and updates of internal and external policies as well as contracts and data processing addendum templates
- Maintaining records of processing activities and reviewing how data is collected, used, and shared by Calendly
- Conducting product and feature reviews
- Training employees regularly on legal and regulatory requirements and providing internal guidance
- Creating privacy documentation and privacy-related resources
- Processing data subject access requests
- Vetting and approving third party vendors and sub-processors
- Reviewing the use of cookies and other similar technologies
- Interacting with our EU and UK representatives

The following sections describe some of the above mentioned items in more detail.

Data Processing Addendum and International Transfers

A Data Processing Addendum (DPA) is a supplement to a services agreement or terms of use, as applicable, specifying roles and obligations that are required by certain data privacy laws. All Calendly customers are subject to Calendly's DPA made available to our platform customers during the contract review process. We require that our customers use our DPA template because it is specifically designed to cover the Calendly recruiting service.

Calendly is a US-based company. As such, user and candidate data is hosted in data centers located in the US. However, we take the subject of data transfers very seriously, particularly regarding the international transfer of personal information from the European Economic Area (EEA), United Kingdom (UK) or Switzerland to Calendly in the US. Calendly has incorporated the newest GDPR-mandated Standard Contractual Clauses, the UK addendum, and Swiss data transfer clauses into its DPA as its legal transfer mechanisms under GDPR, UK and Swiss data privacy laws.

This subject continues to evolve as evidenced by the current updates on the potential new EU-US Privacy Framework and the UK-US Data Bridge. Our Privacy Team continuously tracks additional guidance from data protection authorities, adequacy decisions and any related court decisions closely, including the EU-US Privacy Framework discussions, and will take the necessary steps to update our data transfer mechanisms as appropriate.

Sub-processors

Calendly has executed DPAs with all sub-processors who receive personal information to assist with the provision of the Calendly service. Our DPAs with our sub-processors include obligations that are at least as restrictive as Calendly's obligations in its DPA with its customers with respect to data protection. Prior to entering into a contract, each sub-processor is carefully reviewed as part of our vendor due diligence process and we check things like their security and privacy programs and documentation, certifications, and evidence of recent data breaches, among others.

Calendly maintains a sub-processors list that you may access at any time here. The sub-processors used for our scheduling automation platform for recruiting teams are listed towards the bottom of the page in the second box. We update this list from time to time. If you would like to be notified when updates to this list occur, please sign up here.

Government Requests

Due to the nature of our business and types of personal information we collect, Calendly generally does not process personal information that is of particular interest to US or other third country law enforcement or intelligence services.

Calendly has policies and procedures setting out the steps Calendly takes upon receipt of a government demand to provide customer personal information in order to assess the validity and scope of the demand. Our priority is to protect our customers' personal information and rights while remaining compliant with legal requirements.

Data Subject Requests

Data privacy laws may grant certain rights to individuals - either users or candidates (also known as "data subjects" in some jurisdictions) when it comes

to their personal information. Some of these rights (and the terminology may also vary by jurisdiction) could include, but are not limited to:

- The right to be informed
- The right of access
- The right to rectification
- The right to restrict processing
- The right to data portability
- The right to object

We understand that these requests often need to be processed in a timely manner. As a data processor and a service provider, we aim to empower our customers to handle some of these data subject requests where possible within the recruiting platform. These controls are available to you whether you choose to extend data subject rights to anyone or solely to the requests that are legally required.

If Calendly receives a request from a data subject directly in its role as a data processor, Calendly will promptly inform you of the request (where data subjects identify you as the data controller), and will advise the requestor to submit their request directly to you. Calendly will reasonably assist you with processing data subject requests in the event that you cannot act on such requests without our assistance.

Right to Erasure

Deletion requests are perhaps one of the most common data subject rights requests received by organizations. Calendly allows you to delete personal information from your candidates directly from your settings, without needing to contact Calendly's support or privacy teams.
You may easily delete data from a candidate by clicking on "Settings" → "Company Settings" → "Privacy".

For data subject requests regarding user data deletion, please email privacy@calendly.com.

User Permissions

As you navigate the roles and responsibilities within your organization regarding these data subject rights, another important operational element to consider is the key user permissions within the platform itself. Calendly offers 4 different permissions for your users:

- Recruiting Coordinator users
- Recruiter users
- Admin users
- Interviewer users

Each role has set permissions ranging from complete control to limited control of functionality. Recruiting coordinators and admins, for example, have all permissions, whereas other users, such as interviewers, do not. You will need to define roles and responsibilities within your organization to operationalize these requests on your own.

Cookies

Calendly uses cookies to provide certain features and improve the user experience of our service. When your candidate visits the scheduling page for the first time (and periodically as notices need to be refreshed), candidates will see a cookie banner in accordance with their local requirements and a link at the bottom right of the scheduling page to change their cookie preferences.

Data Security

Customer trust is critical to everything we do at Calendly. Our software is designed to request the most limited access to customer resources to achieve a seamless interview scheduling experience. We are continuously mindful of your privacy, security, and compliance obligations. Securing the personal information we collect from you is a crucial component to achieving these goals.

Calendly has implemented a range of technical and organizational measures to secure your personal information. Examples of our technical and organizational measures include, but are not limited to:

- Personnel management controls such as vetting employees and contractors before hiring, providing secure tools, deploying infrastructure and endpoint protections and providing the training necessary to conduct work, and securely managing employee departures
- Security controls in the cloud such as continuous monitoring, distributed data centers with layered security, continuous availability, secure by design infrastructure, identity and access management controls, least privilege access, appropriate firewall configurations, as well as encryption at rest and in transit, among others
    - Regarding encryption, Calendly requires HTTPS for all services using TLS (v1.2 or higher using non-deprecated cipher suites) with HSTS enabled and SHA-256 with 2048 bit RSA encryption
- Incident response, disaster recovery and business continuity policies and controls such as incident response processes, emergency succession plans, and data backup and restoration plans
- Integration with single sign-on providers

Calendar Integrations

You may use either the Google Calendar or Office365 integrations to connect your calendar with our platform to simplify scheduling for the users within your organization. We will use the minimum required scope to perform basic functions such as read access to users' calendars, profile information as well as write access to book meetings and send emails on your behalf (to enable you to automatically send meeting information to your candidates).

Following the principles above, actual details regarding the integration may vary depending on whether you are using Google or Office 365 and depend on the functionality made available by your connected calendar provider.

ATS Integrations

You may use either the Google Calendar or Office365 integrations to connect your calendar with our platform to simplify scheduling for the users within your organization. We will use the minimum required scope to perform basic functions such as read access to users' calendars, profile information as well as write access to book meetings and send emails on your behalf (to enable you to automatically send meeting information to your candidates).

Following the principles above, actual details regarding the integration may vary depending on whether you are using Google or Office 365 and depend on the functionality made available by your connected calendar provider.

Application Integrations

To meet your organization's communication, interview, and security needs, our platform also provides integrations to conferencing (e.g., Zoom, BlueJeans, etc.), chat (e.g., Slack, Microsoft Teams, etc.), coding assessments (e.g., CoderPad. HackerRank, etc), and single sign on providers (e.g., Okta, etc.). More information about some of these integrations can be found here.

Additional Resources

In addition to this document, we encourage you to review our Privacy Notice and the Calendly's Prelude Help Center to delve into topics that may be more specific to your use or intended use of our recruiting solution. From time to time, we also update these resources to reflect changes in our business, to include details around data processing and technical information, or to comply with new laws and regulations.

Conclusion

Calendly's mission is to help you schedule more efficiently. We are committed to protecting your personal information and the personal information of all candidates who interact with our scheduling automation platform for recruiting teams. We believe that transparency and control are key to a successful partnership. The regulatory landscape is also constantly evolving. As a result, we are continuously looking for ways to improve your ability to obtain the necessary information or take necessary actions with the Calendly service to meet your compliance obligations.

We hope that this document has provided you with valuable information about our privacy practices and that it will help you make informed decisions about operationalizing your privacy program while using our platform.

If you have any additional questions or suggestions, please don't hesitate to reach out to us. You can contact us at privacy@calendly.com.